

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

GM CASTING HOUSE INC.,	§	
	§	
Plaintiff,	§	
	§	Case No. 1:24-cv-1821
v.	§	
	§	Jury Trial Demanded.
FOREVER COMPANIES, INC.	§	
	§	
Defendant.	§	

MOTION TO WITHDRAW
AS COUNSEL FOR DEFENDANT, FOREVER COMPANIES, INC.

NOW COMES attorneys Daniel R. Woods, James M. Rozak and the Law Firm of Goldberg Segalla LLP (“Movants”) pursuant to Local Rules 83.17 and 83.39, and hereby request their collective withdrawal as counsel for Defendant Forever Companies, Inc., (“Defendant”). In support hereof, Movants state as follows:

1. On April 8, 2024, April 9, 2024 and May 6, 2024, attorneys James M. Rozak, Kenneth A. Matuszewski and Daniel R. Woods of the Law Firm of Goldberg Segalla LLP filed their Appearances as attorneys for Defendant. Mr. Matuszewski has subsequently left the employ of Goldberg Segalla LLP but has not withdrawn his appearance.

2. On October 18, 2024, Daniel R. Woods received an e-mail from Defendant’s Interim Restructuring Officer consenting to the withdrawal of Goldberg Segalla LLP and its attorneys from the case.

3. Defendant is aware that the case remains pending before the Honorable Jeffrey I. Cummings, that written discovery is outstanding, and that Magistrate Judge Young Kim has offered additional assistance with settlement efforts.

4. Additional counsel for Defendant, Forever Companies, Inc. appeared pro hac vice as of October 9, 2024 (Docs. #29 and #31), and thus the “notification of party contact information” requirement of Local Rule 83.17 does not apply.

5. This request is being made pursuant to L.R. 83.39 as Defendant has requested the withdrawal of Goldberg Segalla LLP and its attorneys as Defendant’s counsel. The request for withdrawal is for financial reasons.

WHEREFORE, Movants Daniel R. Woods, James M. Rozak and the Law Firm of Goldberg Segalla LLP requests that this Court enter an order permitting the withdrawal of James M. Rozak, Kenneth A. Matuszewski and Daniel R. Woods as attorneys for Defendant, Forever Companies, Inc. in this case.

Dated: November 11, 2024

Respectfully submitted,

/s/ Daniel R. Woods

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CERTIFICATE OF SERVICE

The undersigned counsel states that a copy of the foregoing **Motion to Withdraw as Counsel for Defendant** was filed with the United States District Court for the Northern District of Illinois using the CM/ECF system on November 11, 2024, which will send notification of such filings to all parties of record.

By: /s/ Daniel R. Woods
One of the Attorneys for Defendant